

## REMARKS

Claims 1, 2, and 4-17 remain pending in the application. Applicant, by this paper, amends claims 1 and 4 and presents claims 1, 2, and 4-17 for reconsideration and allowance.

### Discussion of Rejections Under 35 U.S.C. §103(a)

Claims 1, 2, and 4-17 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over U.S. Patent No. 6,195,335 to Calvignac et al. (hereinafter Calvignac) in view of U.S. Patent No. 5,933,449 to Meyer (hereinafter Meyer). The Examiner contends that the combination of the references teaches all of the claimed elements.

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be reasonable expectation of success. Finally, the prior art reference, or references when combined, must teach or suggest all of the claim limitations.

Claim 1 includes "a controller, operable to control said cross-bar switch to interconnect any two of said plurality of bi-directional data ports by selectively enabling a *single* control output associated with the *bi-directional* interconnection of the two of said plurality of bi-directional data ports." Claim 1, (*emphasis added*). Neither Calvignac nor Meyer describes "a *single* control output associated with the *bi-directional* interconnection" of two bidirectional ports. As conceded by the Examiner, Calvignac fails to describe a plurality of bi-directional ports. *Office Action*, page 4. The Examiner contends that one of ordinary skill in the art would seek to modify Calvignac to include bi-directional ports in view of Meyer. However, neither reference teaches or suggests "a *single* control output associated with the *bi-directional* interconnection" of two bidirectional ports. In Calvignac, at least two control lines corresponding to the input gate 200 and the output gate 210 need to be independently controlled just to enable a single crosspoint. Therefore, the references, either alone or in combination, fail to describe all claimed features.

Claim 4 includes "an interface controller having a first, second, and third control outputs" and a plurality of buffers, with each buffer "having an input, an output, and a single control input." Each of the first, second and third control outputs is coupled to the single control inputs of two of the buffers to enable bi-directional interconnection of two of the interfaces.

Neither Calvignac nor Meyer describes a control output coupled to single control inputs of buffers in such a manner to provide bi-directional interconnection of interfaces. Therefore, Applicant respectfully requests reconsideration and allowance of claim 4.

Claim 11 also includes  $n$  interfaces and an interface controller having  $nC_2$  control outputs. "[E]ach one of said plurality of control outputs is coupled to said control inputs of the two of said plurality of buffers that couples a *unique pair* of the ( $C_2$ ) combinations of said interface inputs and outputs." Neither Calvignac nor Meyer disclose two buffers that couples a *unique pair of interface inputs and outputs*, and thus do not disclose a control output from an interface controller coupled to control inputs of the two buffers. Applicant respectfully requests reconsideration and allowance of claim 11.

Claims 2, 5-10, and 12-17 depend, either directly or indirectly, from one of claims 1, 4 and 11 and are believed to be allowable at least for the reason that they depend from an allowable base claim. Reconsideration and allowance of the dependent claims is respectfully requested.

### CONCLUSION

In light of the arguments presented above, the Applicants respectfully submit that the instant claims are patentable. Accordingly, reconsideration and allowance of this Application is earnestly solicited. Should any issues remain unresolved, the Examiner is encouraged to telephone the undersigned at the number provided below.

Respectfully submitted,



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By: \_\_\_\_\_

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